

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding Flexible Use in Mid-Band Spectrum)	GN Docket No. 17-183
Between 3.7 and 24 GHz)	

COMMENTS OF THE ALLIANCE OF AUTOMOBILE MANUFACTURERS

The Alliance of Automobile Manufacturers (“Alliance”) hereby submits these comments in response to the Notice of Inquiry (“NOI”) released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding.¹ The NOI seeks comment on potential opportunities for additional flexible use of spectrum bands between 3.7 and 24 GHz,² including whether to allow the operation of unlicensed devices in the 5.925-6.425 GHz band.³

The Commission should not allow unlicensed devices to operate immediately above 5.925 GHz if it adopts Qualcomm’s re-channelization proposal, which would require movement of latency-sensitive vehicle-to-vehicle (“V2V”) safety communications to the top of the 5.850-5.925 (“5.9”) GHz Dedicated Short Range Communications (“DRSC”) band.⁴ Allowing unlicensed devices to operate in the 5.925-6.425 GHz band could significantly increase the risk of harmful interference to primary service V2V, vehicle-to-infrastructure, and vehicle-to-

¹ *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, Notice of Inquiry, 32 FCC Rcd 6373 (2017) (“*NOI*”).

² *See id.* ¶ 1.

³ *See id.* ¶ 29.

⁴ *See The Commission Seeks to Update and Refresh the Record in the “Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band” Proceeding*, Public Notice, 81 FCC Rcd 36501 (2016).

everything (collectively, “V2X”) systems, especially if the Commission requires a re-channelization of the 5.9 GHz DSRC band.

Moreover, the Commission should expressly seek comment on the out-of-band emission limits that should apply to any unlicensed devices that operate in the 5.925-6.425 GHz band prior to allowing such use. Its inquiry should seek information on the nature of the unlicensed devices being contemplated (including whether they will likely be available for widespread consumer use) and the technical measures (beyond satisfying specified OOB limits) that the proponents of such operations would take to avoid causing harmful interference to V2X systems. The FCC should also consider requiring real-world testing to determine the impact of the unlicensed devices on adjacent band V2X systems. Although the NOI seeks comment on how to mitigate the risk of interference from unlicensed devices to licensed services in the 5.925-6.425 MHz band, it does not seek input on how unlicensed devices in that band would mitigate the risk of interference to adjacent band licensed services.⁵ As the Alliance previously pointed out, seeking public input on this issue would help ensure that the Commission obtains the information it needs to develop technical rules that are capable of protecting V2X communications below 5.925 GHz.⁶

⁵ See NOI ¶ 29.

⁶ See, e.g., Letter from Ari Q. Fitzgerald, Counsel, the Alliance, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 17-183 (filed July 26, 2017); The Alliance, Comments, ET Docket No. 13-49 (filed July 7, 2016).

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Respectfully submitted,

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October 2, 2017